

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

KELORA SYSTEMS, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:10-cv-683
	§	
TARGET CORPORATION, et al.,	§	
	§	
Defendants.	§	

**DEFENDANTS SHOPKO STORES OPERATING CO., LLC’S
AND NATIONAL BUSINESS FURNITURE, LLC’S
MOTION TO DISMISS AND IN THE ALTERNATIVE
MOTION FOR A MORE DEFINITE STATEMENT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants Shopko Stores Operating Co., LLC (“Shopko”) and National Business Furniture, LLC (“NBF”), by their attorneys Quarles & Brady LLP, move to dismiss the claims against Shopko and NBF in Plaintiff Kelora Systems, LLC’s (“Plaintiff”) First Amended Complaint of Patent Infringement. In the alternative, Shopko and NBF move for a more definite statement of Plaintiff’s claims against Shopko and NBF pursuant to Rule 12(e). Shopko and NBF file this motion in lieu of answers and without waiving their rights to answer or further respond to the allegations in Plaintiff’s First Amended Complaint for Patent Infringement.

In support of this Motion, Shopko and NBF submit Defendants Shopko Stores Operating Co., LLC’s and National Business Furniture, LLC’s Brief in Support of its Motion to Dismiss and in the Alternative Motion for a More Definite Statement.

Dated this 14th day of January, 2011.

/s/ Martha Jahn Snyder

Anthony A. Tomaselli

aat@quarles.com

Kristin Graham Noel

kgn@quarles.com

Martha Jahn Snyder

martha.snyder@quarles.com

QUARLES & BRADY LLP

33 East Main Street, Suite 900

P.O. Box 2113

Madison, WI 53701-2113

Tel: (608) 251-5000

Fax: (608) 251-9166

Attorneys for Defendants

National Business Furniture, LLC and

Shopko Stores Operating Co., LLC

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2011, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing to all counsel of record.

Dated this 14th day of January 2011.

/s/ Martha Jahn Snyder

Martha Jahn Snyder